

Report: CZR0026

23RD JUDICIAL CIRCUIT
JEFFERSON
CIRCUIT COURT DOCKET SHEETDate: 05-Jun-2015
Time: 8:41:23AM
Page: 1**15JE-CC00346 ANNIE KRAH V DDR CORP. Security Level: 1 Public**

Case Type:	CC Pers Injury-Other	Case Filing Date:	30-Apr-2015
Status:	Pet Filed in Circuit Ct		
Disposition:		Disposition Date:	

		<u>Release/Status Change Date</u>	<u>Reason</u>
Judge	ROBERT G WILKINS (27975)		
Plaintiff	ANNIE LOUISE KRAH (KRAAL5856)		
Attorney for Plaintiff	JEREMY ANDREW GOGEL (61866)		
Defendant	DDR CORP (@116826)		

<u>Filing Date</u>	<u>Description</u>
30-Apr-2015	Judge Assigned Pet Filed in Circuit Ct Petition. On Behalf Of: ANNIE LOUISE KRAH Filing Info Sheet eFiling Filed By: JEREMY A GOGEL
01-May-2015	Summons Issued-Circuit Document ID: 15-SMCC-770, for DDR CORP.. Service/Attempt Date: 06-May-2015 Case Review Scheduled Scheduled For: 10-Aug-2015; 9:29 AM; ROBERT G WILKINS; Setting: 0; Jefferson CONTROL DATE
11-May-2015	Return Service - Other Document ID - 15-SMCC-770; Served To - DDR CORP.; Server - SO ST LOUIS COUNTY-CLAYTON; Served Date - 06-MAY-15; Served Time - 09:00:00; Service Type - Sheriff Department; Reason Description - Other

IN THE CIRCUIT COURT OF JEFFERSON COUNTY
STATE OF MISSOURI

ANNIE KRAH

5348 Benck Rd.
Imperial, MO 63052

Plaintiff,

V.

DDR CORP.

Please Serve Registered Agent At:

CT Corporation
120 South Central Ave.
Clayton, MO 63105

Defendant.

Cause No.

Division No.

Jury Trial Demanded

Damages Exceed \$25,000

PETITION

COMES NOW Plaintiff, Annie Krah, by and through her undersigned attorney,
and for her cause of action against Defendant DDR Corp., states the following:

1. Plaintiff Annie Krah is a citizen and resident of Jefferson County, Missouri.
2. Defendant DDR Corp. is a limited liability company in good standing in the State of Missouri, and the owner of the property located at 3835 Vogel Rd Arnold, Missouri 63010.
3. This cause of action is for legal relief against Defendant for negligent acts or omissions as described below.
4. All of the occurrences herein mentioned occurred in Jefferson County, Missouri, and therefore, venue is proper in this Court pursuant to RSMo. § 508.010(4).

5. On or about October 28, 2014, Plaintiff was a guest at the premises identified in paragraph 2, above, when she was injured after her shopping cart fell into a hole that was obstructed by the items in the shopping cart, causing Plaintiff to fall to the ground.

6. As a guest of Defendant's, Plaintiff enjoyed the status of an invitee of Defendant.

7. As a result of the fall, Plaintiff was caused to suffer significant injuries necessitating medical treatment.

8. The pothole was a dangerous condition on Defendant's property at the time of Plaintiff's injury in that Defendant failed to exercise reasonable care to protect Plaintiff in one or more of the following respects:

- a) failure to properly and adequately keep invitees away from the pothole;
- b) failure to protect or warn Plaintiff about the pothole;
- c) failure to provide a safe means of ingress and egress at the site of the location where Plaintiff's injury occurred;
- d) negligently failing to remove the pothole.

9. The dangerous condition of the path created a reasonably foreseeable risk of harm of the kind of injury which occurred to Plaintiff.

10. The dangerous condition on the property needlessly endangered the public and those using Defendant's premises.

11. Defendant, through its agents and employees knew or should have known of this dangerous condition in sufficient time prior Plaintiff's injury to have taken measures to protect Plaintiff against this dangerous condition.

12. Defendant had the obligation to maintain its premises in a reasonably safe condition, yet failed to do so.

13. As a direct and proximate result of Defendant's negligence, Plaintiff sustained serious injuries to her body.

14. Plaintiff has sustained, and will in the future sustain, damages for medical bills and costs relating to medical treatment for her injuries.

15. Plaintiff has suffered pain and suffering in the past and will do so in the future.

WHEREFORE, Plaintiff Annie Krah prays for judgment against Defendant DDR Corp. in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00), that will fairly and reasonably compensate her for her injuries and damages, for the losses she has sustained and will sustain in the future, for the cost of these proceedings, and for any further just and proper relief.

RESPECTFULLY SUBMITTED,

THE GOGEL LAW FIRM,

/s/ Jeremy A. Gogel

Jeremy A. Gogel, #61866
4542 West Pine Boulevard
St. Louis, Missouri 63108
Phone: (314) 775-3864
Fax: (314) 531-1069
Email: jeremy@gogellawfirm.com
Attorney for Plaintiff

15JE-CC00346

Electronically Filed - Jefferson - April 30, 2015 - 04:24 PM

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CASE INFORMATION

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DATE: 4/30/15
COURT LOCATION: Jefferson County - Circuit Court
CASE TYPE: TF - Personal Injury-Other
CASE STYLE: ANNIE KRAH V. DDR CORP.

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PARTY INFORMATION

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PARTY TYPE: PLT - Plaintiff
SSN:
FIRST NAME: ANNIE
MIDDLE NAME:
LAST NAME: KRAH
SUFFIX:
GENDER:
DOB: 04/16/1964
E-MAIL:
PHONE:
ADDRESS:
5348 BENK RD.
IMPERIAL, MO 63052
FILER: 61866 - JEREMY ANDREW GOGEL

PARTY TYPE: DFT - Defendant
EIN:
ORGANIZATION: DDR CORP.
E-MAIL:
PHONE:
ADDRESS:
120 SOUTH CENTRAL AVE.
CLAYTON, MO 63105

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SUBMITTER INFORMATION

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SUBMITTED BY: 61866 - Jeremy Andrew Gogel
PHONE: (314) 775-3864
E-MAIL: jeremy@gogellawfirm.com
ADDRESS:
JEREMY A. GOGEL
4542 WEST PINE BOULEVARD
SAINT LOUIS, MO 63108



IN THE 23RD JUDICIAL CIRCUIT COURT, JEFFERSON COUNTY, MISSOURI

Judge or Division: ROBERT G WILKINS	Case Number: 15JE-CC00346
Plaintiff/Petitioner: ANNIE LOUISE KRAH	Plaintiff's/Petitioner's Attorney/Address JEREMY ANDREW GOGEL 12161 COUNTRY MANOR LANE CREVE COEUR, MO 63141
Defendant/Respondent: DDR CORP.	Court Address: P O BOX 100 300 MAIN ST HILLSBORO, MO 63050
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DDR CORP.

Alias:

CT CORPORATION
120 SOUTH CENTRAL AVE.
CLAYTON, MO 63105

COURT SEAL OF



JEFFERSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

DATE: 05/01/15

MICHAEL REUTER- CIRCUIT CLERK
BY: /s/ TRACI VANMATRE- DEPUTY CLERK

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years.
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

_____ (name) _____ (title).

☐ other _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary \$ _____
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$._____ per mile)
 Total \$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

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IN THE 23RD JUDICIAL CIRCUIT COURT, JEFFERSON COUNTY, MISSOURI

Judge or Division: ROBERT G WILKINS	Case Number: 15JE-CC00346	FILED MAY 11 2015 MICHAEL E. REUTER CIRCUIT CLERK (Date File Stamp)
Plaintiff/Petitioner: ANNIE LOUISE KRAH	Plaintiff's/Petitioner's Attorney/Address JEREMY ANDREW GOGEL 12161 COUNTRY MANOR LANE CREVE COEUR, MO 63141	
Defendant/Respondent: DDR CORP.	Court Address: P O BOX 100 300 MAIN ST HILLSBORO, MO 63050	
Nature of Suit: CC Pers Injury-Other		

Summons in Civil Case

The State of Missouri to: DDR CORP.

Alias:

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CLAYTON, MO 63105

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COURT SEAL OF



JEFFERSON COUNTY

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- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____
Served at _____ CT CORP. LCW - B. LOVE _____ (address)
in _____ (County/City of St. Louis), MO, on MAY 06 2015 (date) at 9:35 (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date):

My commission expires: _____

Date

Notary Public

Sheriff's Fees

Summons \$ _____
Non Est \$ _____
Sheriff's Deputy Salary \$ _____
Supplemental Surcharge \$ 10.00
Mileage \$ _____ (_____ miles @ \$._____ per mile)
Total \$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

15-SMCC-3418

I certify and attest that the above is a true copy of the original record of the Court in case number 15JE-CC00346 as it appears on file in my office.

Issued 6-4-15

Michael E. Reuter, Circuit Clerk
Jefferson County Circuit Court

By Traci VanMatre
Deputy Clerk

